

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

SHOSHANA HEBSEHI,  
Plaintiff,

No. 4:13-cv-10253

v.

Hon. Terrence G. Berg  
Magistrate Laurie Michelson

UNITED STATES OF AMERICA, FRONTIER  
AIRLINES, INC., JOHN BRAND, in his  
individual capacity, UNKNOWN FBI AGENT  
1, in his individual capacity, UNKNOWN FBI  
AGENT 2, in his individual capacity, JOHN  
ETLING, in his individual capacity, MARK  
DEBEAU, in his individual capacity, JEREMY  
BOHN, in his individual capacity, CAPTAIN  
PATRICK DRISCOLL, in his individual  
capacity, OFFICER GRANT, in his individual  
capacity, LT M. WASIUKANIS, in his  
individual capacity, TOYA PARKER, in her  
individual capacity, DT. CARMONA, in his  
or her individual capacity, OFFICER  
JOHNSON, in his or her individual capacity,  
CORPORAL BRADLEY, in his or her  
individual capacity, UNKNOWN CBP  
OFFICER, in his individual capacity, THOMAS  
PIPIS, in his individual capacity, DAVID  
LAKOTOS, in his individual capacity,  
NATHANIEL DEVINS, in his individual  
capacity, UNKNOWN TSA AGENT 1, in his  
individual capacity, UNKNOWN TSA AGENT  
2, in her individual capacity, ROBERT BALL,  
in his individual capacity, UNKNOWN ICE  
OFFICER, in his individual capacity, and  
PAUL BRUMLEY, in his individual capacity, \_\_\_\_\_ /

MARK DEBEAU, JEREMY BOHN, CAPTAIN  
PATRICK DRISCOLL, OFFICER GRANT,  
LT M. WASIUKANIS, TOYA PARKER, DT.  
CARMONA, OFFICER JOHNSON, and  
CORPORAL BRADLEY,

Cross Plaintiffs,

v.

FRONTIER AIRLINES, INC.

Cross Defendant.

SARAH MEHTA (P76024)  
MICHAEL J. STEINBERG (P43085)  
KARY L. MOSS (P49759)  
ACLU OF MICHIGAN  
Attorneys for Plaintiff  
2966 Woodward Avenue  
Detroit, MI 48201  
(313) 578-6823  
[smehta@aclumich.org](mailto:smehta@aclumich.org)  
[msteinberge@aclumich.org](mailto:msteinberge@aclumich.org)  
[kmoss@aclumich.org](mailto:kmoss@aclumich.org)

DENNIS D. PARKER  
RACHEL E. GOODMAN  
AYIRINI FONSCECA-SABUNE  
ACLU  
Attorneys for Plaintiff  
125 Broad Street, 18<sup>th</sup> Floor  
New York, NY 10004  
(212) 549-2500  
(212) 549-2651  
[dparker@aclu.org](mailto:dparker@aclu.org)  
[rgoodman@aclu.org](mailto:rgoodman@aclu.org)  
[afonseca-sabune@aclu.org](mailto:afonseca-sabune@aclu.org)

WILLIAM H. GOODMAN (P14173)  
JULIE HORWITZ (P34720)  
KATHRYN BRUNER JAMES (P71374)  
GOODMAN & HURWITZ PC  
Attorneys for Plaintiff  
1394 E. Jefferson Avenue  
Detroit, MI 48207  
(313) 567-6170  
[bgoodman@goodmanhurwitz.com](mailto:bgoodman@goodmanhurwitz.com)  
[jurwitz@goodmanhurwitz.com](mailto:jurwitz@goodmanhurwitz.com)  
[kjames@goodmanhurwitz.com](mailto:kjames@goodmanhurwitz.com)

ANNA ENGH  
SHELLI CALLAND  
ARJUN SETH  
SARAH TREMONT (P73809)  
COVINGTON & BURLING LLP  
Attorneys for Plaintiff  
1201 Pennsylvania Ave., N.W.  
Washington, DC 20004  
(202) 662-6000  
[aengh@cov.com](mailto:aengh@cov.com)  
[scalland@cov.com](mailto:scalland@cov.com)  
[Aasethi@cov.com](mailto:Aasethi@cov.com)  
[stremont@cov.com](mailto:stremont@cov.com)

ALAN B. HAVIS (P36988)  
LAW OFFICES OF ALAN B. HAVIS ESQ.  
Attorney for Mark Debeau, Officer Grant,  
Toya Parker, Dt. Carmona, and Officer  
Johnson  
25505 W. 12 Mile Road, Suite 1000  
Southfield, MI 48034  
(248) 353-3690  
[ahavis@AirportDefender.com](mailto:ahavis@AirportDefender.com)

T. JOSEPH SEWARD (P35095)  
CUMMINGS MCCLOREY DAVIS & ACHO  
Attorney for Jeremy Bohn, Captain Patrick  
Driscoll, Lt. M. Wasiukanis, and Corporal  
Bradley  
33900 Schoolcraft Road  
Livonia, MI 48150  
(734) 261-2400  
[tjseward@cmda-law.com](mailto:tjseward@cmda-law.com)

LYNN M. DODGE (P38136)  
UNITED STATES ATTORNEY'S OFFICE  
Attorney for John Brand, John Etling,  
Thomas Pipis, David Lakotos, Nathanael  
Devins, Robert Ball, Paul Brumley and  
the United States  
211 W. Fort Street, Suite 2001  
Detroit, MI 48226  
(313) 226-0205  
[Lynn.Dodge@usdoj.gov](mailto:Lynn.Dodge@usdoj.gov)

SARAH E. WHITMAN  
UNITED STATES DEPT. OF JUSTICE  
Attorney for John Brand, John Etling,  
Thomas Pipis, David Lakotos, Nathanael  
Devins, Robert Ball, Paul Brumley and  
the United States  
Torts Branch, Civil Division  
P.O. Box 7146, Ben Franklin Station  
Washington, DC 20044  
(202) 616-0089  
[Sarah.Whitman@usdoj.gov](mailto:Sarah.Whitman@usdoj.gov)

BRIAN T. MAY (IL 6288778)  
PAULA WEGMAN (IL 6239491)  
STEVEN BOLDT (IL 6302430)  
ADLER, MURPHY & MCQILLEN LLP  
Attorneys for Defendant Frontier Airlines, Inc.  
20 S. Clark Street, Ste. 2500  
Chicago, IL 60603  
(312) 345-0700  
[bmayer@amm-law.com](mailto:bmayer@amm-law.com)  
[pwegman@amm-law.com](mailto:pwegman@amm-law.com)  
[sboldt@amm-law.com](mailto:sboldt@amm-law.com)

ALEXANDER A. AYAR (P69623)  
FOSTER, SWIFT, COLLINS & SMITH PC  
Attorney for Defendant Frontier Airlines, Inc.



32300 Northwestern Hwy., Ste. 230  
Farmington Hills, MI 48334  
(248) 538-6326  
[AAyar@fosterswift.com](mailto:AAyar@fosterswift.com)

---

I, Alan B. Havis, hereby certify that I am employed by the law firm of The Law Office of Alan B. Havis, Esq., attorney for Defendants MARK DEBEAU, OFFICER GRANT, TOYA PARKER, DT. CARMONA, and OFFICER JOHNSON, only, in the above-entitled cause of action and that on May 16, 2013, I served correct copies of **DEFENDANTS MARK DEBEAU, OFFICER GRANT, TOYA PARKER, DT. CARMONA, AND OFFICER JOHNSON'S CROSS COMPLAINT AGAINST FRONTIER AIRLINES, INC.**, along with this Proof of Service upon:

ADLER, MURPHY & MCQILLEN LLP  
Brian T. May  
Paula Wegman  
Steven Boldt  
20 S. Clark Street, Ste. 2500  
Chicago, IL 60603

FOSTER, SWIFT, COLLINS & SMITH PC  
Alexander A. Ayar  
32300 Northwestern Hwy., Ste. 230  
Farmington Hills, MI 48334

by placing said copies in an envelope, correctly and plainly addressed as shown above, and depositing said envelope in the United States Mail, with postage thereon fully prepaid.

/s/Alan B. Havis

**Certificate of Service**

I hereby certify that on May 16, 2013, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

SARA MEHTA (P76024)  
MICHAEL J. STEINBERG (P43085)  
KARY L. MOSS (P49759)  
T. JOSEPH SEWARD (P35095)

DENNIS D. PARKER  
RACHEL E. GOODMAN  
AYIRINI FONSCECA-SABUNE  
LYNN M. DODGE (P38136)  
WILLIAM H. GOODMAN (P14173)  
JULIE HORWITZ (P34720)  
KATHRYN BRUNER JAMES (P71374)  
SARAH E. WHITMAN  
ANNA ENGH  
SHELLI CALLAND  
ARJUN SETH  
SARAH TREMONT (P73809)  
BRIAN T. MAYE (IL 6288778)  
PAULA L. WEGMAN (IL 6239491)  
STEVEN . BOLDT (IL6302430)  
ALEXANDER A. AYAR (P69623)

/s/Alan B. Havis

Law Office of Alan B. Havis, Esq.  
25505 W. 12 Mile Rd., Ste. 1000  
Southfield, MI 48034  
Phone: (248) 353-3690  
[ahavis@AirportDefender.com](mailto:ahavis@AirportDefender.com)  
P-36988